

GLAVIN PLLC  
156 West 56<sup>th</sup> Street, Ste. 2004  
New York, New York 10019  
646-693-5505

October 10, 2023

**BY ECF**

Honorable Sarah L. Cave  
United States Magistrate Judge  
Southern District of New York  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl Street, Courtroom 18A  
New York, New York 10007

**Re: *Charlotte Bennett v. Andrew M. Cuomo et al.*, 22-CV-7846 (VSB)**

Dear Judge Cave:

We represent former Governor Andrew M. Cuomo and write concerning the joint letter and proposed Amended Protective Order filed with the Court on October 6, 2023 (ECF No. 101). As outlined in that letter, the only remaining dispute among the Parties concerned language proposed by Governor Cuomo regarding the designation of already public information as confidential. However, in an effort to narrow the disputes among the Parties and before the Court, Governor Cuomo and Melissa DeRosa agree to withdraw that proposed language and rely on the original language in the Amended Protective Order. Rather than burden the Court with this dispute at this time, the Parties will raise any disputes related to designations in a manner consistent with the Amended Protective Order, as necessary, when they arise.

In light of this development, we believe the conference today can be adjourned and the Parties can file their proposed Amended Protective Order with the Court instead.

Respectfully submitted,

*/s/ Rita Glavin*

Rita Glavin